

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

DENIS MESAMOUR, a/k/a MESAMOUR DENIS  
AND THONY VALL, a/k/a VALL THONY  
Plaintiffs

CIVIL ACTION NO.: 3:11-cv-00812

v.

DOUGLAS PERLITZ; FATHER PAUL E.  
CARRIER, S.J.; HOPE E. CARTER; HAITI FUND,  
INC.; FAIRFIELD UNIVERSITY; THE SOCIETY  
OF JESUS OF NEW ENGLAND; JOHN DOE ONE;  
JOHN DOE TWO; JOHN DOE THREE; JOHN  
DOE FOUR; JOHN DOE FIVE; JOHN DOE SIX;  
JOHN DOE SEVEN; JOHN DOE EIGHT; JOHN  
DOE NINE; JOHN DOE TEN; JOHN DOE  
ELEVEN; AND JOHN DOE TWELVE,  
Defendants

**AMENDED COMPLAINT AND JURY TRIAL DEMAND**

**A. INTRODUCTION**

1. Defendants Douglas Perlitz, Father Paul E. Carrier, S.J., Fairfield University and other Defendants established a residential school in the Republic of Haiti, the poorest country in the Western Hemisphere. This school, Project Pierre Toussaint, purported to provide services to the poorest children of Haiti, many of whom lacked homes and regular meals. Defendant Douglas Perlitz was the director in Haiti of Project Pierre Toussaint, which provided him with an image of substantial trust and authority. Defendant Douglas Perlitz used that trust and authority,

with the assistance of other Defendants to sexually molest Plaintiffs and numerous other minor boys who attended Project Pierre Toussaint. Defendant Douglas Perlitz was convicted of violating 18 U.S.C. §2423(b), Travel With Intent To Engage In Illicit Sexual Conduct. In molesting Plaintiffs, Defendant Douglas Perlitz was aided by the intentional or negligent acts of the other Defendants. Plaintiffs seek damages for Plaintiffs' personal injuries pursuant to 18 U.S.C. §2255 and common law.

**B. JURISDICTION AND VENUE**

2. Plaintiffs bring this civil action pursuant to 18 U.S.C. §2255, Civil Remedy for Personal Injuries, and the laws of the State of Connecticut. As to the §2255 claims, jurisdiction is conferred on this Court by 18 U.S.C. §2255 and 28 U.S.C. §1331. As to the state law claims, jurisdiction is conferred on this Court by 28 U.S.C. §1332 as both Plaintiffs are citizens of the Republic of Haiti and all Defendants, as is further described below, are citizens of states of the United States. The amount in controversy, without interest and costs, exceeds the sum specified by 28 U.S.C. §1332. Additionally, as Plaintiffs' state law claims are so related to Plaintiffs' 18 U.S.C. § 2255 claims, this Court also has supplemental jurisdiction over Plaintiffs' state law claims pursuant to 28 U.S.C. §1367.

**C. PARTIES**

3. Plaintiff Denis Mesamour, also known as Mesamour Denis (hereinafter referred to as

Plaintiff “Denis Mesamour”) is a citizen of the Republic of Haiti residing in Cap-Haitien, Haiti.

4. Plaintiff Thony Vall, also known as Vall Thony (hereinafter referred to as Plaintiff “Thony Vall”) is a citizen of the Republic of Haiti residing in Cap-Haitien, Haiti.

5. Defendant Douglas Perlitz (hereinafter referred to as “Defendant Perlitz”) is an individual who, at the time of his arrest in 2009 was a citizen of the State of Colorado. Prior to residing in the State of Colorado, Defendant Perlitz had resided in the State of Connecticut. While a resident of the State of Connecticut, Defendant Perlitz frequently traveled from the State of Connecticut to the Republic of Haiti to reside for extended periods of time in the Republic of Haiti. On December 21, 2010, the United States District Court for the District of Connecticut adjudged Defendant Perlitz guilty of violating 18 U.S.C. §2423(b), Travel With Intent To Engage In Illicit Sexual Conduct. Defendant Perlitz was sentenced to serve 19 years and 7 months in federal prison.

6. Defendant Father Paul E. Carrier, S.J. (hereinafter referred to as Defendant “Father Carrier”) is an individual who is a citizen of the State of Connecticut with a domicile in Bridgeport, Connecticut. During the relevant times Defendant Father Carrier was a religious priest of The Society Of Jesus Of New England; University Chaplain/Director of Campus Ministry and Community Service of Fairfield University in Fairfield, Connecticut; Chairman and/or President of the Haiti Fund, Inc.; and at times material hereto, had a duty to hire,

◇ supervise, direct and retain Defendant Perlitz, and a duty not to aid and abet Defendant Perlitz in engaging in criminal conduct.

7. Defendant Hope E. Carter (hereinafter referred to as Defendant “Carter”) is an individual who is a citizen of the State of Connecticut with a domicile in New Canaan, Connecticut. During the relevant time period Defendant Carter was a member of the Board of Directors of the Haiti Fund, Inc.; Secretary of the Board of Directors of the Haiti Fund, Inc.; and at times material hereto, had a duty to hire, supervise, direct and retain Defendant Perlitz, and a duty not to aid and abet Defendant Perlitz in engaging in criminal conduct.

8. Defendant Haiti Fund, Inc. is a Connecticut corporation which funded, managed, controlled and directed Project Pierre Toussaint of Cap-Haitien, Haiti, a program that provided services for minor boys in and around Cap-Haitien, Haiti. As Defendant Haiti Fund, Inc. was incorporated in the State of Connecticut, pursuant to 28 U.S.C. §1332(c)(1), Defendant Haiti Fund, Inc. is a citizen of the State of Connecticut. At all relevant times, Project Pierre Toussaint, the program funded, managed and directed by Defendant Haiti Fund, Inc. operated an intake center at one location, and two different residential schools at two different locations; all the locations were in or around Cap-Haitien, Haiti. The Director in the Republic of Haiti of Project Pierre Toussaint was Defendant Perlitz. At times material hereto, Defendant Haiti Fund, Inc. had a duty to hire, supervise, direct and retain Defendant Perlitz, and a duty not to aid and abet

◇ Defendant Perlitz in engaging in criminal conduct.

9. Defendant Fairfield University is a Connecticut corporation with a principal place of business in Fairfield, Connecticut. As Fairfield University was incorporated in the State of Connecticut, pursuant to 28 U.S.C. §1332(c)(1), Defendant Fairfield University is a citizen of the State of Connecticut. At all relevant times, Defendant Fairfield University hired, supervised, directed and retained Defendant Father Carrier. At all relevant times, Defendant Fairfield University had placed employees, officers, or agents of Defendant Fairfield University in management and/or leadership positions of Defendant Haiti Fund, Inc. At all relevant times, Defendant Fairfield University had represented that Defendant Haiti Fund, Inc. was engaged in activities supported, managed and sponsored by Defendant Fairfield University. At all relevant times, Defendant Fairfield University had a duty to hire, supervise, direct and retain Defendant Perlitz.

10. Defendant The Society of Jesus of New England (hereinafter referred to as Defendant “The New England Jesuit Order”) is a Massachusetts non-profit corporation doing business in the State of Connecticut. As Defendant New England Jesuit Order was incorporated in the State of Massachusetts, pursuant to 28 U.S.C. §1332(c)(1), Defendant The New England Jesuit Order is a citizen of the State of Massachusetts. At all relevant times, Defendant The New England Jesuit Order had a duty to hire, supervise, direct and retain Defendant Father Carrier.

◇ 11. Defendants John Doe One, John Doe Two, John Doe Three, John Doe Four, and John Doe Five are individuals whose identities are presently unknown to the Plaintiffs; therefore, the Plaintiffs file the above-captioned action against Defendants John Doe One, John Doe Two, John Doe Three, John Doe Four, and John Doe Five by such fictitious names. Defendants John Doe One, John Doe Two, John Doe Three, John Doe Four, and John Doe Five are citizens of the State of Connecticut or other states of the United States. The Plaintiffs will seek leave to amend this Complaint to add the true name or names of Defendants John Doe One, John Doe Two, John Doe Three, John Doe Four, and John Doe Five when said name or names have been ascertained. The Plaintiffs allege that Defendants John Doe One, John Doe Two, John Doe Three, John Doe Four, and John Doe Five aided and abetted Defendant Perlitz in engaging in criminal conduct which resulted in harm to the Plaintiffs.

12. Defendants John Doe Six, John Doe Seven, John Doe Eight, John Doe Nine, and John Doe Ten are individuals whose identities are presently unknown to the Plaintiffs; therefore, the Plaintiffs file the above-captioned action against Defendants John Doe Six, John Doe Seven, John Doe Eight, John Doe Nine, and John Doe Ten by such fictitious names. Defendants John Doe Six, John Doe Seven, John Doe Eight, John Doe Nine, and John Doe Ten are citizens of the State of Connecticut or other states of the United States. The Plaintiffs will seek leave to amend this Complaint to add the true name or names of Defendants John Doe Six, John Doe Seven,

John Doe Eight, John Doe Nine, and John Doe Ten when said name or names have been ascertained. The Plaintiffs allege that Defendants John Doe Six, John Doe Seven, John Doe Eight, John Doe Nine, and John Doe Ten were responsible for the hiring, supervision, direction and retention of Defendant Perlitz.

13. Defendants John Doe Eleven and John Doe Twelve are individuals whose identities are presently unknown to the Plaintiffs; therefore, the Plaintiffs file the above-captioned action against Defendants John Doe Eleven and John Doe Twelve by such fictitious names. Defendants John Doe Eleven and John Doe Twelve are citizens of the State of Connecticut or other states of the United States. The Plaintiffs will seek leave to amend this Complaint to add the true name or names of Defendants John Doe Eleven and John Doe Twelve when said name or names have been ascertained. The Plaintiffs allege that Defendants John Doe Eleven and John Doe Twelve were responsible for the hiring, supervision, direction and retention of Defendant Father Carrier.

**D. STATEMENT OF FACTS PERTAINING TO CLAIMS OF BOTH PLAINTIFFS**

14. Defendant Perlitz with the assistance of Defendants Father Carrier, Carter, Fairfield University, and John Doe Six through John Doe Ten obtained funding from the Order of Malta in approximately 1997 to start and operate Project Pierre Toussaint, a school for boys in Cap-Haitien, Haiti. Project Pierre Toussaint established an intake center that came to be referred to as the 13th Street Intake Program. Project Pierre Toussaint provided services to boys of all ages, many of whom were street children. The youngest children served by Project Pierre Toussaint

◇ were six years of age. Project Pierre Toussaint provided a variety of services to the minor boys, including but not limited to, meals, access to running water for baths or showers, basic classroom instruction, and sports activities. Defendant Perlitz employed Americans and Haitians to work at Project Pierre Toussaint.

15. Defendant Perlitz with the assistance of Defendants Father Carrier, Carter, Haiti Fund, Inc., Fairfield University, and John Doe Six through John Doe Ten obtained additional funding in approximately 1999 to expand Project Pierre Toussaint to include a residential facility referred to as the Village.

16. Through Project Pierre Toussaint, as Defendants Father Carrier, Carter, Haiti Fund, Inc., Fairfield University, The New England Jesuit Order and John Doe One through John Doe Ten knew at relevant times, Defendant Perlitz had access to, authority over, and control over the boys participating in Project Pierre Toussaint.

17. Through Project Pierre Toussaint, as Defendants Father Carrier, Carter, Haiti Fund, Inc., Fairfield University, The New England Jesuit Order and John Doe One through John Doe Ten knew at relevant times, Defendant Perlitz was in a position that the minor boys participating in Project Pierre Toussaint would believe they could trust Defendant Perlitz. Through Project Pierre Toussaint, as Defendants Father Carrier, Carter, Haiti Fund, Inc., Fairfield University, The New England Jesuit Order and John Doe One through John Doe Ten knew at relevant times,



Defendant Perlitz was in a position that the minor boys participating in Project Pierre Toussaint would have confidence that the conduct Defendant Perlitz engaged in was to further the best interests of the minor boys.

18. Defendants Father Carrier, Carter, and John Doe One through John Doe Five frequently traveled to Cap-Haitien, Haiti to visit Defendant Perlitz and Project Pierre Toussaint, or otherwise participated in activities at Project Pierre Toussaint. Defendants Father Carrier, Carter and John Doe One through John Doe Five became aware that Defendant Perlitz was engaged in conduct that endangered minor boys participating in Project Pierre Toussaint. In spite of this information, Defendants Father Carrier, Carter, and John Doe One through John Doe Five aided and abetted Defendant Perlitz in Defendant Perlitz's efforts to sexually abuse minor boys participating in Project Pierre Toussaint and in Defendant Perlitz's efforts to conceal Defendant Perlitz's sexual abuse of minors participating in Project Pierre Toussaint.

**E. STATEMENT OF FACTS PERTAINING TO CLAIMS OF  
PLAINTIFF DENIS MESAMOUR**

19. From at least approximately 2003 to 2006, when Plaintiff Denis Mesamour was approximately 13 to 16 years of age, Defendant Perlitz, while in Haiti, engaged in explicit sexual behavior and lewd and lascivious behavior with Plaintiff Denis Mesamour, including but not limited to, Defendant Perlitz engaging in illicit sexual conduct with Plaintiff Denis Mesamour.

20. As a result of Defendant Perlitz's illicit sexual conduct and sexual and lewd and

◇ lascivious conduct with Plaintiff Denis Mesamour, Plaintiff Denis Mesamour has suffered deep emotional pain, is suffering deep emotional pain, and will suffer future deep emotional pain.

21. At all times material hereto, Defendant Perlitz misrepresented and concealed from Plaintiff Denis Mesamour the wrongful nature of the sexual activity and that such sexual activity could harm Plaintiff Denis Mesamour.

22. As a result of the said explicit sexual behavior and lewd and lascivious behavior in which Defendant Perlitz engaged with Plaintiff Denis Mesamour, Plaintiff Denis Mesamour is unable at this time to fully disclose in complete detail to what degree Defendant Perlitz did abuse Plaintiff Denis Mesamour emotionally and physically.

**E. STATEMENT OF FACTS PERTAINING TO CLAIMS OF  
PLAINTIFF THONY VALL**

23. From at least approximately 2001 to 2006, when Plaintiff Thony Vall was approximately 13 to 17 years of age, Defendant Perlitz, while in Haiti, engaged in explicit sexual behavior and lewd and lascivious behavior with Plaintiff Thony Vall, including but not limited to, Defendant Perlitz engaging in illicit sexual conduct with Plaintiff Thony Vall.

24. As a result of Defendant Perlitz's illicit sexual conduct and sexual and lewd and lascivious conduct with Plaintiff Thony Vall, Plaintiff Thony Vall has suffered deep emotional pain, is suffering deep emotional pain, and will suffer future deep emotional pain.

25. At all times material hereto, Defendant Perlitz misrepresented and concealed from Plaintiff Thony Vall the wrongful nature of the sexual activity and that such sexual activity could harm Plaintiff Thony Vall.

26. As a result of the said explicit sexual behavior and lewd and lascivious behavior in which Defendant Perlitz engaged with Plaintiff Thony Vall, Plaintiff Thony Vall is unable at this time to fully disclose in complete detail to what degree Defendant Perlitz did abuse Plaintiff Thony Vall emotionally and physically.

**G. PLAINTIFF DENIS MESAMOUR'S CLAIMS FOR RELIEF**

**Count I: Civil Remedy for Personal Injuries Pursuant to 18 U.S.C. §2255 (Plaintiff Denis Mesamour v. Defendant Perlitz)**

27. Plaintiff Denis Mesamour repeats, realleges, and incorporates by reference herein each and every allegation heretofore pleaded in paragraphs 1 through 22 of this Complaint.

28. Defendant Perlitz violated 18 U.S.C. §2423(b), Travel With Intent To Engage In Illicit Sexual Conduct. Plaintiff Denis Mesamour, while a minor, was a victim of Defendant Perlitz's violation of 18 U.S.C. §2423(b).

29. Plaintiff Denis Mesamour has suffered substantial injuries as a result of Defendant Perlitz's violations of 18 U.S.C. §2423(b). Plaintiff Denis Mesamour is seeking damages, the cost of this suit, and reasonable attorney's fees pursuant to 18 U.S.C. §2255.

**Count II: Civil Remedy for Personal Injuries Pursuant to 18 U.S.C. §2255 (Plaintiff Denis Mesamour v. Defendants Father Carrier, Carter, Haiti Fund, Inc., John Doe One, John Doe Two, John Doe Three, John Doe Four and John Doe Five)**

30. Plaintiff Denis Mesamour repeats, realleges, and incorporates by reference herein each and every allegation heretofore pleaded in paragraphs 1 through 22 and paragraphs 27 through 29 of this Complaint.

31. Defendant Perlitz violated 18 U.S.C. §2423(b), Travel With Intent To Engage In Illicit Sexual Conduct. Defendants Father Carrier, Carter, Haiti Fund, Inc., John Doe One, John Doe Two, John Doe Three, John Doe Four, and John Doe Five aided and abetted Defendant Perlitz in violating 18 U.S.C. §2423(b).

32. Plaintiff Denis Mesamour, while a minor, was a victim of the above referenced violations of 18 U.S.C. §2423(b), which Defendants Father Carrier, Carter, Haiti Fund, Inc., John Doe One, John Doe Two, John Doe Three, John Doe Four, and John Doe Five aided and abetted Defendant Perlitz in committing.

33. Plaintiff Denis Mesamour has suffered substantial injuries as a result of the assistance provided by Defendants Father Carrier, Carter, Haiti Fund, Inc., and John Doe One

through John Doe Five to Defendant Perlitz for the purpose of aiding and abetting Defendant Perlitz's violation of 18 U.S.C. §2423(b). Plaintiff Denis Mesamour is seeking damages, the cost of this suit, and reasonable attorney's fees pursuant to 18 U.S.C. §2255.

**Count III: Assault (Plaintiff Denis Mesamour v. Defendant Perlitz)**

34. Plaintiff Denis Mesamour repeats, realleges, and incorporates by reference herein each and every allegation heretofore pleaded in paragraphs 1 through 22 and paragraphs 27 through 33 of this in this Complaint.

35. By engaging in the egregious and explicit sexual behavior described above, Defendant Perlitz acted intentionally so as to cause harmful and offensive contact with Plaintiff Denis Mesamour.

36. By engaging in the egregious and explicit sexual behavior described above, Defendant Perlitz placed Plaintiff Denis Mesamour in imminent and reasonable apprehension of said harmful and offensive contact.

37. As a direct and proximate result of Defendant Perlitz placing Plaintiff Denis Mesamour in imminent and reasonable apprehension of harmful and offensive contact, Plaintiff Denis Mesamour suffered and will continue to suffer in the future: severe and permanent mental distress and emotional injuries as outlined above; financial expenses for medical and therapeutic care and treatment; long term lost earning capacity; as well as other damages.

◇ **Count IV: Battery (Plaintiff Denis Mesamour v. Defendant Perlitz)**

38. Plaintiff Denis Mesamour repeats, realleges, and incorporates by reference herein each and every allegation heretofore pleaded in paragraphs 1 through 22 and paragraphs 27 through 37 of this Complaint.

39. By engaging in the egregious and explicit sexual behavior described above, Defendant Perlitz acted intentionally so as to cause unjustified harmful and offensive physical contact and touching of Plaintiff Denis Mesamour, and repeatedly performed such unjustified harmful and offensive physical contact and touching.

40. As a direct and proximate result of Defendant Perlitz's unjustified harmful and offensive physical contact and touching, Plaintiff Denis Mesamour suffered and will continue to suffer in the future: severe and permanent mental distress and emotional injuries as outlined above; financial expenses for medical and therapeutic care and treatment; long term lost earning capacity; as well as other damages.

**Count V: Intentional Infliction of Emotional Distress (Plaintiff Denis Mesamour v. Defendant Perlitz)**

41. Plaintiff Denis Mesamour repeats, realleges, and incorporates by reference herein each and every allegation heretofore pleaded in paragraphs 1 through 22 and paragraphs 27 through 40 of this Complaint.

42. By engaging in the egregious and explicit sexual behavior described above,

◇ Defendant Perlitz intended to inflict emotional distress upon Plaintiff Denis Mesamour, or he knew or should have known that emotional distress was the likely result of his conduct.

43. The conduct of Defendant Perlitz in engaging in the egregious and explicit sexual behavior described above was extreme and outrageous, beyond all possible bounds of decency, and utterly intolerable in a civilized community.

44. As a direct and proximate result of the conduct of Defendant Perlitz in engaging in the egregious and explicit sexual behavior described above, Plaintiff Denis Mesamour suffered and will continue to suffer in the future: severe and permanent mental distress and emotional injuries as outlined above; financial expenses for medical and therapeutic care and treatment; long term lost earning capacity; as well as other damages.

45. The mental distress and emotional injuries which Plaintiff Denis Mesamour suffered and will continue to suffer were severe, and of a nature that no reasonable person could be expected to endure them.

**Count VI: Negligent Infliction of Emotional Distress (Plaintiff Denis Mesamour v. Defendant Perlitz)**

46. Plaintiff Denis Mesamour repeats, realleges, and incorporates by reference herein each and every allegation heretofore pleaded in paragraphs 1 through 22 and paragraphs 27 through 45 of this Complaint.

47. During the period of time that Defendant Perlitz was the director of Project Pierre

◇ Toussaint and Plaintiff Denis Mesamour as a minor child received services from Project Pierre Toussaint, Defendant Perlitz had a duty to act reasonably toward Plaintiff Denis Mesamour.

48. Defendant Perlitz's conduct as described above created an unreasonable risk of causing Plaintiff Denis Mesamour emotional distress.

49. The emotional distress Plaintiff Denis Mesamour experienced as a result of Defendant Perlitz's conduct as described above was foreseeable.

50. The emotional distress Plaintiff Denis Mesamour experienced as a result of Defendant Perlitz's conduct as described above was severe enough it might result in illness or bodily harm.

51. As a direct and proximate result of the conduct of Defendant Perlitz in engaging in the sexual behavior described above, Plaintiff Denis Mesamour suffered and will continue to suffer in the future: severe and permanent mental distress and emotional injuries as outlined above; financial expenses for medical and therapeutic care and treatment; long term lost earning capacity; as well as other damages.

**Count VII: Negligent Hiring, Retention, Direction, and Supervision of Defendant Perlitz (Plaintiff Denis Mesamour v. Defendants Father Carrier, Carter, Haiti Fund, Inc., Fairfield University, The New England Jesuit Order, John Doe Six, John Doe Seven, John Doe Eight, John Doe Nine, and John Doe Ten)**

52. Plaintiff Denis Mesamour repeats, realleges, and incorporates by reference herein



◇ each and every allegation heretofore pleaded in paragraphs 1 through 22 and paragraphs 27 through 51 of this Complaint.

53. At all relevant times to this action, the responsibilities of Father Carrier, Carter, Haiti Fund, Inc., Fairfield University, The New England Jesuit Order, John Doe Six, John Doe Seven, John Doe Eight, John Doe Nine, and John Doe Ten (hereinafter referred to as the “Perlitz Supervisory Defendants”) included the hiring, retention, direction, and supervision of Defendant Perlitz.

54. At all relevant times to this action, the Perlitz Supervisory Defendants knew or should have known that Defendant Perlitz would interact and was interacting with individuals, including minors, and more specifically, was interacting with Plaintiff Denis Mesamour.

55. At all relevant times to this action, the Perlitz Supervisory Defendants had a special relationship with Defendant Perlitz or Plaintiff Denis Mesamour.

56. At all relevant times to this action, the Perlitz Supervisory Defendants had a duty of care to properly hire, retain, direct, and supervise individuals of good reputation and character who would be asked to interact with minors in the Republic of Haiti.

57. At all relevant times to this action, the Perlitz Supervisory Defendants negligently breached said duty by hiring and retaining Defendant Perlitz, an individual whom the Perlitz Supervisory Defendants knew or should have known was of bad character and reputation and

unable to properly interact with minors. The Perlitz Supervisory Defendants improperly and inadequately directed and supervised Defendant Perlitz.

58. At all relevant times to this action, the Perlitz Supervisory Defendants knew or should have known that Defendant Perlitz's intentional and negligent conduct would result in severe mental and emotional suffering by Plaintiff Denis Mesamour.

59. As a direct and proximate result of the Perlitz Supervisory Defendants' negligent conduct, Plaintiff Denis Mesamour suffered and will continue to suffer in the future: severe and permanent mental distress and emotional injuries, financial expenses for medical and therapeutic care and treatment; lost long-term earning capacity; as well as other damages.

**Count VIII: Negligent Hiring, Retention, Direction, and Supervision of Defendant Father Carrier (Plaintiff Denis Mesamour v. Defendants Haiti Fund, Inc., Fairfield University, The New England Jesuit Order, John Doe Eleven and John Doe Twelve)**

60. Plaintiff Denis Mesamour repeats, realleges, and incorporates by reference herein each and every allegation heretofore pleaded in paragraphs 1 through 22 and paragraphs 27 through 59 of this Complaint.

61. At all relevant times to this action, the responsibilities of Haiti Fund, Inc., Fairfield University, The New England Jesuit Order, John Doe Eleven and John Doe Twelve (hereinafter referred to as the "Father Carrier Supervisory Defendants") included the hiring, retention, direction, and supervision of Defendant Father Carrier.

◇ 62. At all relevant times to this action, the Father Carrier Supervisory Defendants knew or should have known that Defendant Father Carrier was directly managing, supervising, controlling and directing Defendant Perlitz who the Father Carrier Supervisory Defendants knew or should have known was interacting with minors, and more specifically, was interacting with Plaintiff Denis Mesamour.

63. At all relevant times to this action, the Father Carrier Supervisory Defendants had a special relationship with Defendant Father Carrier or Plaintiff Denis Mesamour.

64. At all relevant times to this action, the Father Carrier Supervisory Defendants had a duty of care to properly hire, retain, direct, and supervise individuals of good reputation and character who directly managed, supervised, controlled and directed Defendant Perlitz who was interacting on a daily basis with extremely vulnerable minors in the Republic of Haiti.

65. At all relevant times to this action, the Father Carrier Supervisory Defendants negligently breached said duty by hiring and retaining Father Carrier, an individual whom the Father Carrier Supervisory Defendants knew or should have known was of bad character and reputation and unable to properly manage, supervise, control and direct Defendant Perlitz who was interacting on a daily basis with extremely vulnerable minors in the Republic of Haiti. The Father Carrier Supervisory Defendants improperly and inadequately directed and supervised Defendant Father Carrier.

◇

66. At all relevant times to this action, the Father Carrier Supervisory Defendants knew or should have known that Defendant Father Carrier's intentional and negligent conduct would result in severe mental and emotional suffering by Plaintiff Denis Mesamour.

67. As a direct and proximate result of the Father Carrier Supervisory Defendants' negligent conduct, Plaintiff Denis Mesamour suffered and will continue to suffer in the future: severe and permanent mental distress and emotional injuries, financial expenses for medical and therapeutic care and treatment; lost long-term earning capacity; as well as other damages.

**Count IX: Breach of Fiduciary Duty (Plaintiff Denis Mesamour v. Defendants Father Carrier, Carter, Haiti Fund, Inc., Fairfield University, The New England Jesuit Order, and John Doe One Through John Doe Twelve)**

68. Plaintiff Denis Mesamour repeats, realleges, and incorporates by reference herein each and every allegation heretofore pleaded in paragraphs 1 through 22 and paragraphs 27 through 67 of this Complaint.

69. At all relevant times, Defendants Father Carrier, Carter, Haiti Fund, Inc., Fairfield University, The New England Jesuit Order, and John Doe One through John Doe Twelve knew Project Pierre Toussaint, operated, managed and controlled by Defendant Perlitz was providing services to extremely vulnerable minors in the Republic of Haiti.

70. At all relevant times, Defendants Father Carrier, Carter, Haiti Fund, Inc., Fairfield University, The New England Jesuit Order, and John Doe One through John Doe Twelve

◇ sponsored and promoted Project Pierre Toussaint which the Defendants knew was providing services to extremely vulnerable minors in the Republic of Haiti.

71. Defendants Father Carrier, Carter, Haiti Fund, Inc., Fairfield University, The New England Jesuit Order, and John Doe One through John Doe Twelve each had a fiduciary obligation to the Haitian minors participating in Project Pierre Toussaint, specifically including Plaintiff Denis Mesamour.

72. Defendants Father Carrier, Carter, Haiti Fund, Inc., Fairfield University, The New England Jesuit Order, and John Doe One through John Doe Twelve each breached their fiduciary duty to Plaintiff Denis Mesamour.

73. As a direct and proximate result of the breach of fiduciary duty by Defendants Father Carrier, Carter, Haiti Fund, Inc., Fairfield University, The New England Jesuit Order, and John Doe One through John Doe Twelve, Plaintiff Denis Mesamour suffered and will continue to suffer in the future: severe and permanent mental distress and emotional injuries, financial expenses for medical and therapeutic care and treatment; lost long-term earning capacity; as well as other damages.

**Count X: Vicarious Liability (Plaintiff Denis Mesamour v. Defendants Father Carrier, Carter, Haiti Fund, Inc., Fairfield University, The New England Jesuit Order, John Doe Six, John Doe Seven, John Doe Eight, John Doe Nine, and John Doe Ten)**

74. Plaintiff Denis Mesamour repeats, realleges, and incorporates by reference herein

◇ each and every allegation heretofore pleaded in paragraphs 1 through 22 and paragraphs 27 through 73 of this Complaint.

75. At all relevant times Defendant Haiti Fund, Inc. funded, managed, controlled and directed Project Pierre Toussaint. At all relevant times, Defendant Perlitz was Defendant Haiti Fund, Inc.'s agent in the Republic of Haiti managing, controlling and directing Project Pierre Toussaint.

76. At all relevant times Defendant Father Carrier was Chairman and/or President of the Haiti Fund, Inc. At all relevant times, Defendant Carter was a member of the Board of Directors of the Haiti Fund, Inc., and at relevant times Defendant Carter was Secretary of the Board of Directors of the Haiti Fund, Inc. On numerous occasions Defendants Father Carrier and Carter traveled to Haiti to manage and oversee Project Pierre Toussaint. At all relevant times Defendant Perlitz acted as an agent of Defendants Father Carrier and Carter.

77. At all relevant times, Defendant Fairfield University had placed employees, officers, or agents of Defendant Fairfield University in management and/or leadership positions of Defendant Haiti Fund, Inc. At all relevant times, Defendant Fairfield University had represented that Project Pierre Toussaint was engaged in activities supported, managed and sponsored by Defendant Fairfield University. At all relevant times Defendant Perlitz acted as an agent of Defendant Fairfield University.

78. At relevant times Defendant Perlitz acted as an agent of Defendants John Doe Six, John Doe Seven, John Doe Eight, John Doe Nine, and John Doe Ten.

79. Through Project Pierre Toussaint Defendant Perlitz was in a position that the minor boys participating in Project Pierre Toussaint would believe they could trust Defendant Perlitz. Through Project Pierre Toussaint, Defendant Perlitz was in a position that the minor boys participating in Project Pierre Toussaint would have confidence that the conduct Defendant Perlitz engaged in was to further the best interests of the minor boys.

80. Defendant Perlitz used the existence of his agency relationship with Defendants Haiti Fund, Inc., Father Carrier, Carter, Fairfield University, John Doe Six, John Doe Seven, John Doe Eight, John Doe Nine, and John Doe Ten to gain the trust and confidence of Plaintiff Denis Mesamour so that Defendant Perlitz could sexually molest Plaintiff Denis Mesamour. As described above Defendant Perlitz using the existence of his agency relationship with Defendants Haiti Fund, Inc., Father Carrier, Carter, Fairfield University, John Doe Six, John Doe Seven, John Doe Eight, John Doe Nine, and John Doe Ten did sexually abuse Plaintiff Denis Mesamour.

81. As a direct and proximate result of Defendant Perlitz using the existence of his agency relationship with Defendants Haiti Fund, Inc., Father Carrier, Carter, Fairfield University, John Doe Six, John Doe Seven, John Doe Eight, John Doe Nine, and John Doe Ten

to sexually molest Plaintiff Denis Mesamour, Plaintiff Denis Mesamour suffered and will continue to suffer in the future: severe and permanent mental distress and emotional injuries, financial expenses for medical and therapeutic care and treatment; lost long-term earning capacity; as well as other damages.

**H. PLAINTIFF THONY VALL'S CLAIMS FOR RELIEF**

**Count XI: Civil Remedy for Personal Injuries Pursuant to 18 U.S.C. §2255 (Plaintiff Thony Vall v. Defendant Perlitz)**

82. Plaintiff Thony Vall repeats, realleges, and incorporates by reference herein each and every allegation heretofore pleaded in paragraphs 1 through 18 and paragraphs 23 through 26 of this Complaint.

83. Defendant Perlitz violated 18 U.S.C. §2423(b), Travel With Intent To Engage In Illicit Sexual Conduct. Plaintiff Thony Vall, while a minor, was a victim of Defendant Perlitz's violation of 18 U.S.C. §2423(b).

84. Plaintiff Thony Vall has suffered substantial injuries as a result of Defendant Perlitz's violations of 18 U.S.C. §2423(b). Plaintiff Thony Vall is seeking damages, the cost of this suit, and reasonable attorney's fees pursuant to 18 U.S.C. §2255.

**Count XII: Civil Remedy for Personal Injuries Pursuant to 18 U.S.C. §2255 (Plaintiff Thony Vall v. Defendants Father Carrier, Carter, Haiti Fund, Inc., John Doe One, John Doe Two, John Doe Three, John Doe Four and John Doe Five)**

85. Plaintiff Thony Vall repeats, realleges, and incorporates by reference herein each and



every allegation heretofore pleaded in paragraphs 1 through 18, paragraphs 23 through 26, and paragraphs 82 through 84 of this Complaint.

86. Defendant Perlitz violated 18 U.S.C. §2423(b), Travel With Intent To Engage In Illicit Sexual Conduct. Defendants Father Carrier, Carter, Haiti Fund, Inc., John Doe One, John Doe Two, John Doe Three, John Doe Four, and John Doe Five aided and abetted Defendant Perlitz in violating 18 U.S.C. §2423(b).

87. Plaintiff Thony Vall, while a minor, was a victim of the above referenced violations of 18 U.S.C. §2423(b), which Defendants Father Carrier, Carter, Haiti Fund, Inc., John Doe One, John Doe Two, John Doe Three, John Doe Four, and John Doe Five aided and abetted Defendant Perlitz in committing.

88. Plaintiff Thony Vall has suffered substantial injuries as a result of the assistance provided by Defendants Father Carrier, Carter, Haiti Fund, Inc., and John Doe One through John Doe Five to Defendant Perlitz for the purpose of aiding and abetting Defendant Perlitz's violation of 18 U.S.C. §2423(b). Plaintiff Thony Vall is seeking damages, the cost of this suit, and reasonable attorney's fees pursuant to 18 U.S.C. §2255.

**Count XIII: Assault (Plaintiff Thony Vall v. Defendant Perlitz)**

89. Plaintiff Thony Vall repeats, realleges, and incorporates by reference herein each and every allegation heretofore pleaded in paragraphs 1 through 18, paragraphs 23 through 26, and paragraphs 82 through 88 of this Complaint.

◇ 90. By engaging in the egregious and explicit sexual behavior described above, Defendant Perlitz acted intentionally so as to cause harmful and offensive contact with Plaintiff Thony Vall.

91. By engaging in the egregious and explicit sexual behavior described above, Defendant Perlitz placed Plaintiff Thony Vall in imminent and reasonable apprehension of said harmful and offensive contact.

92. As a direct and proximate result of Defendant Perlitz placing Plaintiff Thony Vall in imminent and reasonable apprehension of harmful and offensive contact, Plaintiff Thony Vall suffered and will continue to suffer in the future: severe and permanent mental distress and emotional injuries as outlined above; financial expenses for medical and therapeutic care and treatment; long term lost earning capacity; as well as other damages.

**Count XIV: Battery (Plaintiff Thony Vall v. Defendant Perlitz)**

93. Plaintiff Thony Vall repeats, realleges, and incorporates by reference herein each and every allegation heretofore pleaded in paragraphs 1 through 18, paragraphs 23 through 26, and paragraphs 82 through 92 of this Complaint.

94. By engaging in the egregious and explicit sexual behavior described above, Defendant Perlitz acted intentionally so as to cause unjustified harmful and offensive physical contact and touching of Plaintiff Thony Vall, and repeatedly performed such unjustified harmful and offensive physical contact and touching.

◇

95. As a direct and proximate result of Defendant Perlitz's unjustified harmful and offensive physical contact and touching, Plaintiff Thony Vall suffered and will continue to suffer in the future: severe and permanent mental distress and emotional injuries as outlined above; financial expenses for medical and therapeutic care and treatment; long term lost earning capacity; as well as other damages.

**Count XV: Intentional Infliction of Emotional Distress (Plaintiff Thony Vall v. Defendant Perlitz)**

96. Plaintiff Thony Vall repeats, realleges, and incorporates by reference herein each and every allegation heretofore pleaded in paragraphs 1 through 18, paragraphs 23 through 26, and paragraphs 82 through 95 of this Complaint.

97. By engaging in the egregious and explicit sexual behavior described above, Defendant Perlitz intended to inflict emotional distress upon Plaintiff Thony Vall, or he knew or should have known that emotional distress was the likely result of his conduct.

98. The conduct of Defendant Perlitz in engaging in the egregious and explicit sexual behavior described above was extreme and outrageous, beyond all possible bounds of decency, and utterly intolerable in a civilized community.

99. As a direct and proximate result of the conduct of Defendant Perlitz in engaging in the egregious and explicit sexual behavior described above, Plaintiff Thony Vall suffered and will continue to suffer in the future: severe and permanent mental distress and emotional injuries

as outlined above; financial expenses for medical and therapeutic care and treatment; long term lost earning capacity; as well as other damages.

100. The mental distress and emotional injuries which Plaintiff Thony Vall suffered and will continue to suffer were severe, and of a nature that no reasonable person could be expected to endure them.

**Count XVI: Negligent Infliction of Emotional Distress (Plaintiff Thony Vall v. Defendant Perlitz)**

101. Plaintiff Thony Vall repeats, realleges, and incorporates by reference herein each and every allegation heretofore pleaded in paragraphs 1 through 18, paragraphs 23 through 26, and paragraphs 82 through 100 of this Complaint.

102. During the period of time that Defendant Perlitz was the director of Project Pierre Toussaint and Plaintiff Thony Vall as a minor child received services from Project Pierre Toussaint, Defendant Perlitz had a duty to act reasonably toward Plaintiff Thony Vall.

103. Defendant Perlitz's conduct as described above created an unreasonable risk of causing Plaintiff Thony Vall emotional distress.

104. The emotional distress Plaintiff Thony Vall experienced as a result of Defendant Perlitz's conduct as described above was foreseeable.

105. The emotional distress Plaintiff Thony Vall experienced as a result of Defendant Perlitz's conduct as described above was severe enough it might result in illness or bodily harm.

106. As a direct and proximate result of the conduct of Defendant Perlitz in engaging in the sexual behavior described above, Plaintiff Thony Vall suffered and will continue to suffer in the future: severe and permanent mental distress and emotional injuries as outlined above; financial expenses for medical and therapeutic care and treatment; long term lost earning capacity; as well as other damages.

**Count XVII: Negligent Hiring, Retention, Direction, and Supervision of Defendant Perlitz (Plaintiff Thony Vall v. Defendants Father Carrier, Carter, Haiti Fund, Inc., Fairfield University, The New England Jesuit Order, John Doe Six, John Doe Seven, John Doe Eight, John Doe Nine, and John Doe Ten)**

107. Plaintiff Thony Vall repeats, realleges, and incorporates by reference herein each and every allegation heretofore pleaded in paragraphs 1 through 18, paragraphs 23 through 26, and paragraphs 82 through 106 of this Complaint.

108. At all relevant times to this action, the responsibilities of Father Carrier, Carter, Haiti Fund, Inc., Fairfield University, The New England Jesuit Order, John Doe Six, John Doe Seven, John Doe Eight, John Doe Nine, and John Doe Ten (hereinafter referred to as the “Perlitz Supervisory Defendants”) included the hiring, retention, direction, and supervision of Defendant Perlitz.

109. At all relevant times to this action, the Perlitz Supervisory Defendants knew or should have known that Defendant Perlitz would interact and was interacting with individuals, including minors, and more specifically, was interacting with Plaintiff Thony Vall.

◇ 110. At all relevant times to this action, the Perlitz Supervisory Defendants had a special relationship with Defendant Perlitz or Plaintiff Thony Vall.

111. At all relevant times to this action, the Perlitz Supervisory Defendants had a duty of care to properly hire, retain, direct, and supervise individuals of good reputation and character who would be asked to interact with minors in the Republic of Haiti.

112. At all relevant times to this action, the Perlitz Supervisory Defendants negligently breached said duty by hiring and retaining Defendant Perlitz, an individual whom the Perlitz Supervisory Defendants knew or should have known was of bad character and reputation and unable to properly interact with minors. The Perlitz Supervisory Defendants improperly and inadequately directed and supervised Defendant Perlitz.

113. At all relevant times to this action, the Perlitz Supervisory Defendants knew or should have known that Defendant Perlitz's intentional and negligent conduct would result in severe mental and emotional suffering by Plaintiff Thony Vall.

114. As a direct and proximate result of the Perlitz Supervisory Defendants' negligent conduct, Plaintiff Thony Vall suffered and will continue to suffer in the future: severe and permanent mental distress and emotional injuries, financial expenses for medical and therapeutic care and treatment; lost long-term earning capacity; as well as other damages.

◇ **Count XVIII: Negligent Hiring, Retention, Direction, and Supervision of Defendant Father Carrier (Plaintiff Thony Vall v. Defendants Haiti Fund, Inc., Fairfield University, The New England Jesuit Order, John Doe Eleven and John Doe Twelve)**

115. Plaintiff Thony Vall repeats, realleges, and incorporates by reference herein each and every allegation heretofore pleaded in paragraphs 1 through 18, paragraphs 23 through 26, and paragraphs 82 through 114 of this Complaint.

116. At all relevant times to this action, the responsibilities of Haiti Fund, Inc., Fairfield University, The New England Jesuit Order, John Doe Eleven and John Doe Twelve (hereinafter referred to as the “Father Carrier Supervisory Defendants”) included the hiring, retention, direction, and supervision of Defendant Father Carrier.

117. At all relevant times to this action, the Father Carrier Supervisory Defendants knew or should have known that Defendant Father Carrier was directly managing, supervising, controlling and directing Defendant Perlitz who the Father Carrier Supervisory Defendants knew or should have known was interacting with minors, and more specifically, was interacting with Plaintiff Thony Vall.

118. At all relevant times to this action, the Father Carrier Supervisory Defendants had a special relationship with Defendant Father Carrier or Plaintiff Thony Vall.

119. At all relevant times to this action, the Father Carrier Supervisory Defendants had a duty of care to properly hire, retain, direct, and supervise individuals of good reputation and

◇ character who directly managed, supervised, controlled and directed Defendant Perlitz who was interacting on a daily basis with extremely vulnerable minors in the Republic of Haiti.

120. At all relevant times to this action, the Father Carrier Supervisory Defendants negligently breached said duty by hiring and retaining Father Carrier, an individual whom the Father Carrier Supervisory Defendants knew or should have known was of bad character and reputation and unable to properly manage, supervise, control and direct Defendant Perlitz who was interacting on a daily basis with extremely vulnerable minors in the Republic of Haiti. The Father Carrier Supervisory Defendants improperly and inadequately directed and supervised Defendant Father Carrier.

121. At all relevant times to this action, the Father Carrier Supervisory Defendants knew or should have known that Defendant Father Carrier's intentional and negligent conduct would result in severe mental and emotional suffering by Plaintiff Thony Vall.

122. As a direct and proximate result of the Father Carrier Supervisory Defendants' negligent conduct, Plaintiff Thony Vall suffered and will continue to suffer in the future: severe and permanent mental distress and emotional injuries, financial expenses for medical and therapeutic care and treatment; lost long-term earning capacity; as well as other damages.

**Count XIX: Breach of Fiduciary Duty (Plaintiff Thony Vall v. Defendants Father Carrier, Carter, Haiti Fund, Inc., Fairfield University, The New England Jesuit Order, and John Doe One Through John Doe Twelve)**

123. Plaintiff Thony Vall repeats, realleges, and incorporates by reference herein each and



every allegation heretofore pleaded in paragraphs 1 through 18, paragraphs 23 through 26, and paragraphs 82 through 122 of this Complaint.

124. At all relevant times, Defendants Father Carrier, Carter, Haiti Fund, Inc., Fairfield University, The New England Jesuit Order, and John Doe One through John Doe Twelve knew Project Pierre Toussaint, operated, managed and controlled by Defendant Perlitz was providing services to extremely vulnerable minors in the Republic of Haiti.

125. At all relevant times, Defendants Father Carrier, Carter, Haiti Fund, Inc., Fairfield University, The New England Jesuit Order, and John Doe One through John Doe Twelve sponsored and promoted Project Pierre Toussaint which the Defendants knew was providing services to extremely vulnerable minors in the Republic of Haiti.

126. Defendants Father Carrier, Carter, Haiti Fund, Inc., Fairfield University, The New England Jesuit Order, and John Doe One through John Doe Twelve each had a fiduciary obligation to the Haitian minors participating in Project Pierre Toussaint, specifically including Plaintiff Thony Vall.

127. Defendants Father Carrier, Carter, Haiti Fund, Inc., Fairfield University, The New England Jesuit Order, and John Doe One through John Doe Twelve each breached their fiduciary duty to Plaintiff Thony Vall.

128. As a direct and proximate result of the breach of fiduciary duty by Defendants Father Carrier, Carter, Haiti Fund, Inc., Fairfield University, The New England Jesuit Order, and John Doe One through John Doe Twelve, Plaintiff Thony Vall suffered and will continue to suffer in the future: severe and permanent mental distress and emotional injuries, financial expenses for medical and therapeutic care and treatment; lost long-term earning capacity; as well as other damages.

**Count XX: Vicarious Liability (Plaintiff Thony Vall v. Defendants Father Carrier, Carter, Haiti Fund, Inc., Fairfield University, The New England Jesuit Order, John Doe Six, John Doe Seven, John Doe Eight, John Doe Nine, and John Doe Ten)**

129. Plaintiff Thony Vall repeats, realleges, and incorporates by reference herein each and every allegation heretofore pleaded in paragraphs 1 through 18, paragraphs 23 through 26, and paragraphs 82 through 128 of this Complaint.

130. At all relevant times Defendant Haiti Fund, Inc. funded, managed, controlled and directed Project Pierre Toussaint. At all relevant times, Defendant Perlitz was Defendant Haiti Fund, Inc.'s agent in the Republic of Haiti managing, controlling and directing Project Pierre Toussaint.

131. At all relevant times Defendant Father Carrier was Chairman and/or President of the Haiti Fund, Inc. At all relevant times, Defendant Carter was a member of the Board of Directors of the Haiti Fund, Inc., and at relevant times Defendant Carter was Secretary of the Board of

◇ Directors of the Haiti Fund, Inc. On numerous occasions Defendants Father Carrier and Carter traveled to Haiti to manage and oversee Project Pierre Toussaint. At all relevant times Defendant Perlitz acted as an agent of Defendants Father Carrier and Carter.

132. At all relevant times, Defendant Fairfield University had placed employees, officers, or agents of Defendant Fairfield University in management and/or leadership positions of Defendant Haiti Fund, Inc. At all relevant times, Defendant Fairfield University had represented that Project Pierre Toussaint was engaged in activities supported, managed and sponsored by Defendant Fairfield University. At all relevant times Defendant Perlitz acted as an agent of Defendant Fairfield University.

133. At relevant times Defendant Perlitz acted as an agent of Defendants John Doe Six, John Doe Seven, John Doe Eight, John Doe Nine, and John Doe Ten.

134. Through Project Pierre Toussaint Defendant Perlitz was in a position that the minor boys participating in Project Pierre Toussaint would believe they could trust Defendant Perlitz. Through Project Pierre Toussaint, Defendant Perlitz was in a position that the minor boys participating in Project Pierre Toussaint would have confidence that the conduct Defendant Perlitz engaged in was to further the best interests of the minor boys.

135. Defendant Perlitz used the existence of his agency relationship with Defendants Haiti Fund, Inc., Father Carrier, Carter, Fairfield University, John Doe Six, John Doe Seven,

John Doe Eight, John Doe Nine, and John Doe Ten to gain the trust and confidence of Plaintiff Thony Vall so that Defendant Perlitz could sexually molest Plaintiff Thony Vall. As described above Defendant Perlitz using the existence of his agency relationship with Defendants Haiti Fund, Inc., Father Carrier, Carter, Fairfield University, John Doe Six, John Doe Seven, John Doe Eight, John Doe Nine, and John Doe Ten did sexually abuse Plaintiff Thony Vall.

136. As a direct and proximate result of Defendant Perlitz using the existence of his agency relationship with Defendants Haiti Fund, Inc., Father Carrier, Carter, Fairfield University, John Doe Six, John Doe Seven, John Doe Eight, John Doe Nine, and John Doe Ten to sexually molest Plaintiff Thony Vall, Plaintiff Thony Vall suffered and will continue to suffer in the future: severe and permanent mental distress and emotional injuries, financial expenses for medical and therapeutic care and treatment; lost long-term earning capacity; as well as other damages.

**WHEREFORE**, Plaintiffs respectfully demand the following relief:

1. Plaintiff Denis Mesamour respectfully demands judgment of \$20,000,000 in damages against each Defendant for each count, of Counts I through X above, in which each Defendant is named, plus costs, interest, attorneys' fees, and such other and further relief as this Court deems just and equitable; and

2. Plaintiff Thony Vall respectfully demands judgment of \$20,000,000 in damages

against each Defendant for each count, of Counts XI through XX above, in which each Defendant is named, plus costs, interest, attorneys' fees, and such other and further relief as this Court deems just and equitable.

**PLAINTIFFS' JURY TRIAL DEMAND**

Plaintiffs demand a trial by jury on all claims.

By Plaintiffs' Attorneys,

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